REMARKS

Claims 1-27 remain in this application. The claims have been amended as set forth above. The Applicant respectfully requests reconsideration of the present application and the allowance of claims 1-27.

Claims 7-11, 15, 17-19, and 25-27 were rejected under 35 U.S.C. § 112, second paragraph as being indefinite. The Applicants respectfully submit that this rejection is now moot in view of the amendments to the claims as set forth above. Therefore, withdrawal of the rejection under 35 U.S.C. § 112 is respectfully requested.

Claims 1-27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over a lengthy combination of the "admitted prior art" of Figure 3 of the present application and page 2, last paragraph of the present application, Fung et al. (U.S. Patent No. 6,301,011), Furner et al. (U.S. Patent No. 5,974,474), and Dinallo (U.S. Patent No. 5,727,212). The Applicant respectfully traverses this rejection based on the following remarks.

The Applicant respectfully submits that one of ordinary skill in the art would not have been motivated to combine the arrangement of Figure 3 of the present application, the description at page 2, last paragraph of the present application, the Fung et al. patent, the Furner et al. patent, and the Dinallo patent in the manner suggested by the Examiner, except in hindsight in view of the present application. It is hard to imagine

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how one of ordinary skill in the art could possibly have been motivated to combine all of these different teachings in such a manner without first having the hindsight of the present invention as claimed. Even if one of ordinary skill in the art were motivated to combine all of these teachings at the time of the present invention, the Applicant respectfully submits that one would not have been motivated to combine these teachings in a manner that would render obvious the claims of the present application. For example, the Examiner has asserted that Furner enables a plug and play system to select a better driver for optimized operations, and Fung enables adding a new output device without extensive revision of the system. One of ordinary skill in the art, if motivated to add the teachings of Furner to the system of FIG 3 of the present application, would have added an interface/proxy to select drivers. There would have been no motivation to use this interface/proxy to use this interface/proxy to perform operations on any devices as specifically claimed in the present application. The Examiner has relied on the Fung patent to disclose a supervisory server 420 that delivers data to various output devices 500. However, the supervisory server does not interface with a device driver or OPROM as claimed in the present application.

In addition, none of the prior art relied upon by the Examiner, either alone or in any possible combination thereof, disclose or suggest the a resource access method(s) are called to perform a resource operation on a device in a manner such that an abstraction layer interface hides the resource access method(s) from the device driver or OPROM. The Examiner has relied on the newly cited Dinallo patent to disclose an "abstraction layer interface" (possibly relying on generic device interface 54?) bridging
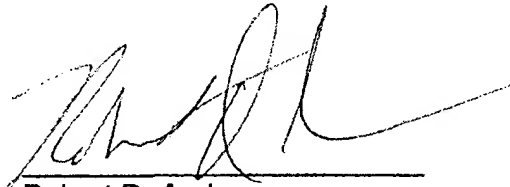
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the Object Oriented Programming (OOP) components to the existing procedural drivers (figures 2 and 5-8), and that Dinallo isolates the OOP components from any device driver by encapsulating the specific driver information, as disclosed in the abstract. The Examiner has additionally asserted that encapsulating the specific driver information is the same as "hiding the resource access methods from the device driver or OPROM", as recited in the claims of the present application. The Applicant respectfully traverses this assertion. FIG 2 illustrates a generic device interface 54 between an object oriented subsystem (component) 50 and procedural device drivers 52. Dinallo discloses that the object oriented component is isolated from the device driver by encapsulating specific driver information associated with that particular device driver and then transporting requests or commands from the object oriented component to the specific device driver when interfacing with the device driver. It is not clear to the Applicant that this means that resource access methods would therefore be hidden from the device driver. Withdrawal of this rejection is therefore respectfully requested. However, if the Examiner maintains this assertion the Applicant respectfully requests that the Examiner explain this leap of reasoning in more detail.

The Applicant respectfully submits that the prior art relied upon by the Examiner does not disclose or suggest at least the features of the present invention as set forth above. In view of the foregoing, the application is considered to be in condition for allowance. Early notification of the same is earnestly solicited. If there are any questions regarding the present application, the Examiner is invited to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,

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